



City of Covington  
16720 SE 271<sup>st</sup> St. Suite 100  
Covington, WA 98042

City Hall – 253.480.2400  
[www.covingtonwa.gov](http://www.covingtonwa.gov)

November 4, 2014

GPT/Custer Spur EIS  
C/O CH2M HILL  
1100 112<sup>th</sup> Avenue NE, Suite 400  
Bellevue, WA 98004

RE: Combined NEPA and SEPA Scoping for the Proposed Gateway Pacific Terminal and Custer Spur

Dear EIS Co-Leaders:

The purpose of this letter is to inform you that the City of Covington would like to be involved with both the NEPA and SEPA Environmental Impact Statement comment periods anticipated in mid-2015 for the above referenced project. The City of Covington offers the following comments on the combined NEPA and SEPA scoping for the proposed Gateway Pacific Terminal (GPT) and associated Custer Spur. The City does so knowing that the scoping public comment period has expired.

**Existing and Projected Growth- Covington Town Center**

A portion of the Burlington Northern Santa Fe (BNSF) track runs along the edge of the Covington City limits and through The Lake at Winterwood, a Covington neighborhood. The track is also adjacent to a Bonneville Power Association (BPA) Substation which is critical to power distribution throughout the region. The at grade crossing at Covington Way, although within King County's jurisdiction, contributes to traffic delays in the area due to limited alternatives. This particular crossing will be more significant due to anticipated growth in neighboring areas over the coming years.

The track is also located to the east of the city's downtown zone and future Town Center district. In 2009, the city completed the Downtown Planning and Zoning Study that identifies key zoning districts within the downtown zone. A portion of the BNSF track runs adjacent to over 30 commercially zoned properties within the city's commercial core. Given the city's long range plans for a viable and economical downtown and Town Center we have strong concerns about the train activity through the southern edge of our city.

The study area should be expanded to include impacts to existing neighborhoods and future growth (as outlined by the GMA and local comprehensive planning documents). Consideration should be given to the economic impacts of community plans, social equity concerns, and property rights issues that may arise from the increased track use. In general, communities and their future land use plans should be evaluated and considered along the travel path, as well as, at the terminus at Cherry Point.

**Critical Areas**

The track also runs adjacent to Jenkins Creek, which is a significant stream that is designated as a Shoreline of the State per the Department of Ecology and adopted in the city's Shoreline Master Program. A portion of Cramer Creek and associated wetland complex is located south of the city limits,

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growing toward greatness.



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and within the area of the tracks. Impacts such as noise, safety, air quality and water quality should be considered for both the neighborhood and critical areas.

#### **Transportation Delay**

From preliminary studies, we have heard estimates of 9 additional eastbound return trips towards Stampede Pass, train lengths of 8,500 feet, and 122% increases in gate-down times on Covington Way South. Also of concern is that studies may be underestimating 2035 Average Daily Traffic Volumes on this route, as well as other routes throughout the region. These additional trips should take into consideration the safety and trigger for additional improvements, including costs that will have to be absorbed by our city. Necessary improvements to accommodate additional trips may have costly impacts on city budgets, especially for smaller cities such as Covington, as well as lasting impacts on our ability to be a thriving city, promote economic development and maintain a healthy budget to provided services to our citizens.

Thank you for consideration of our comments and please keep us notified of further reviews, comment periods, and decisions.

Sincerely,

**Margaret Harto, Mayor  
City of Covington**

cc: Covington City Council